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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - -x
EPLUS, INC., :
:
Plaintiff, :
:
-against- Civil Action No.
:3:09-CV-620
LAWSON SOFTWARE, INC., :
Defendant. :
:
- - - - -x

VIDEOTAPED DEPOSITION of SAP, A.G., by GERARD
WISSING, taken by Defendant at the offices of Howrey,
LLP, 601 Lexington Avenue, New York, New York 10022,
on Tuesday, May 11, 2010, commencing at 12:02 o'clock
p.m., before Annette Forbes, a Certified Shorthand
(Stenotype) Reporter and Notary Public within and for
the State of New York.

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<p>1 questions for the other three products. 2 Let's start with SRM. 3 Has SAP made any changes to the SRM 4 products because of any patents owned by ePlus? 5 A No. 6 Q Has SAP made any changes to the SRM 7 product because of the lawsuit that ePlus filed 8 against SAP? 9 A No. 10 Q Has SAP made any changes to the SRM 11 products because of the settlement agreement it 12 entered into with ePlus? 13 A No. 14 Q Let's go over ERP. 15 Has SAP made any changes to the ERP 16 product because of the lawsuit that was filed 17 against it by ePlus? 18 A No. 19 Q Has SAP made any changes to the ERP 20 product because of any patents owned by ePlus? 21 A No. 22 Q Has SAP made any changes to its ERP 23 product because of the settlement agreement it 24 entered into with ePlus? 25 A No.</p>	<p>1 probably get an answer you are looking 2 for if you ask about specific 3 products. 4 MS. STOLL-DEBELL: Okay. 5 Q Does SAP mark its Business Suite 6 product with any patent numbers? 7 A No. 8 Q Does SAP mark its SRM product with 9 any patent numbers? 10 A No. 11 Q Does SAP mark its ERP product with 12 any patent numbers? 13 A No. 14 Q Does SAP mark CRM product with any 15 patent numbers? 16 A No. 17 Q Has ePlus asked SAP to mark its 18 Business Suite with any patent numbers? 19 MR. NELSON: Objection. 20 Scope. I think it's outside 21 the scope. 22 If you have an answer from 23 your personal knowledge, Mr. Wissing, 24 you may provide it. 25 MS. STOLL-DEBELL: Mr. Nelson,</p>
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<p>1 Q Has SAP made any change to the CRM 2 products because of the lawsuit that was filed 3 against it by ePlus? 4 A No. 5 Q Has SAP made any changes to the CRM 6 product because of any patents owned by ePlus? 7 A No. 8 Q Has SAP made any changes to the CRM 9 product because of the settlement agreement it 10 entered into with ePlus? 11 A No. 12 Q Does SAP mark any of its products 13 with any patent numbers? 14 MR. NELSON: Just a second. 15 I want to think about that 16 one. 17 Is your question does SAP mark 18 any products with any patent numbers? 19 MS. STOLL-DEBELL: Yes. 20 MR. NELSON: It's outside the 21 scope. 22 If you know the answer, you 23 may answer. 24 A I don't know. 25 MR. NELSON: Kirstin, you will</p>	<p>1 I thought you were just going to say 2 objection, scope. 3 MR. NELSON: Sorry. 4 A I don't know. 5 Q Has ePlus asked SAP to mark the SRM 6 product with any patent numbers? 7 MR. NELSON: Objection. 8 Scope. 9 A I don't know. 10 Q Has SAP -- excuse me. 11 Has ePlus asked SAP to mark its ERP 12 products with any patent numbers? 13 MR. NELSON: Objection. 14 Scope. 15 A I don't know. 16 Q Has ePlus asked SAP to mark its CRM 17 products with any patent numbers? 18 MR. NELSON: Same objection as 19 to scope. 20 A I don't know. 21 Q Let's look at Exhibit 47. It should 22 be one page. For the record, we produced it as 23 L0378534. 24 MR. WORCESTER: Like the other 25 one, the one in front of us right now</p>

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